

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DANIEL BRYAN KELLY, )  
                          )  
Plaintiff,             )  
                          )  
vs.                    ) Civil Action No. 2:05-cv-01150-TFM  
                          )  
RICKY OWENS, et al. )  
                          )  
Defendants.           )

PLAINTIFF'S INITIAL DISCLOSURES

Comes now Plaintiff, Daniel Bryan Kelly in the above-styled cause and pursuant to Rule 26.(a)(1) of the Federal Rules of Civil Procedures provides the following:

A. Witnesses.

The following is a list of the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing parties may use to support their defenses, unless solely for impeachment, identifying the subjects of the information:

1. Daniel Bryan Kelly - Plaintiff  
c/o Richard Stockham  
Stockham, Carroll & Smith, P.C.  
Ste. 114  
2204 Lakeshore Drive  
Birmingham, Alabama 35209

Subject of knowledge: Plaintiff may testify regarding his knowledge of the incidents made the basis of the Complaint and the circumstances surrounding these incidents, the actions of defendants, and those of others, prior and subsequent to said incident; the effect these incidents had on him and the suffering they have caused him, and the medical treatment he has received.

2. Sheriff Ricky Owens  
c/o Gary L. Willford, Jr.  
Webb & Eley, P.C.  
7475 Halcyon Pointe Drive (36117)  
Montgomery, AL 36124

Subject of knowledge: Sheriff Ricky Owens, may testify regarding his knowledge of the incidents made the basis of the Plaintiff's Complaint and the circumstances surrounding the incidents, his actions, and those of the Plaintiff, and others, prior and subsequent to said incidents.

3. Al Bradley  
c/o Kristi McDonald  
McDonald & McDonald  
1005 Montgomery Highway  
Birmingham, AL 35216-2805

Subject of knowledge: Al Bradley, may testify regarding his knowledge of the incidents made the basis of the Plaintiff's Complaint and the circumstances surrounding the incidents, his actions, and those of the Plaintiff, and others, prior and subsequent to said incidents.

4. Terry Wilson  
c/o Kristi McDonald  
McDonald & McDonald  
1005 Montgomery Highway  
Birmingham, AL 35216-2805

Subject of knowledge: Terry Wilson, may testify regarding his knowledge of the incidents made the basis of the Plaintiff's Complaint and the circumstances surrounding the incidents, his actions, and those of the Plaintiff, and others, prior and subsequent to said incidents.

5. Wendy Roberson  
c/o Kristi McDonald  
McDonald & McDonald  
1005 Montgomery Highway  
Birmingham, AL 35216-2805

Subject of knowledge: Wendy Roberson , may testify regarding her knowledge of the incidents made the basis of the Plaintiff's Complaint and the circumstances surrounding the incident, her actions, and those of the Plaintiff, and others, prior and subsequent to said incidents.

6. Dr. Randall Weaver  
c/o Stephen M. Doyle  
U.S. Attorney's Office  
P.O. Box 197  
Montgomery, AL 422474

Subject of knowledge: Dr. Weaver is expected to provide information related to the medical treatment of the Plaintiff in the Coosa County Jail.

7. Dana M. Harris  
P.O. Box 279  
Rockford, AL 35136  
(256) 377-2211

Subject of knowledge: Ms. Harris was a jailer at the time of the Plaintiff's incarceration and is expected to provide information related to the Plaintiff's confinement in the Coosa County Jail.

8. Kay Taylor  
P.O. Box 279  
Rockford, AL 35136  
(256) 377-2211

Subject of knowledge: Ms. Taylor was a jailer at the time of the Plaintiff's incarceration and is expected to provide information related to the Plaintiff's confinement in the Coosa County Jail.

9. Aaron Green  
P.O. Box 279  
Rockford, AL 35136  
(256) 377-2211

Subject of knowledge: Mr. Green was a jailer at the time of the Plaintiff's incarceration and is expected to provide information related to the Plaintiff's

confinement in the Coosa County Jail.

10. Brett Oakes  
P.O. Box 279  
Rockford, AL 35136  
(256) 377-2211

Subject of knowledge: Mr. Oakes was a jailer at the time of the Plaintiff's incarceration and is expected to provide information related to the Plaintiff's confinement in the Coosa County Jail.

11. Brandon Stroud  
913 W. Park St.  
Sylacauga, Al 35150  
(356) 295-4924

Subject of knowledge: Mr. Stroud was a jailer at the time of the Plaintiff's incarceration and is expected to provide information related to the Plaintiff's confinement in the Coosa County Jail.

12. Dr. Vincent Law  
1120 Airport Dr. Suite 102  
Alexander City, Al 35010

Subject of knowledge: Dr. Law is expected to provide information related to the diagnosis and medical treatment of the Plaintiff on his hospital admissions on January 16, 2004 and January 28, 2004.

B. DOCUMENTS Plaintiff provides to Defendants.

1. Notebook of Plaintiff's mother during the time of his incarceration regarding his treatment.
2. Hospital records of plaintiff's 1/16/04 admission.
3. Hospital records of plaintiff's 1/28/04 admission.
4. Dr. Law's 2/2/04 note regarding Plaintiff.

5. Recommendation of Matthew Hilyer on 11/25/03
6. Dr. Weaver's records of plaintiff
7. Jail med sheet
8. Statement of Brandon Stroud.
9. Photos of plaintiff in hospital January 2004.

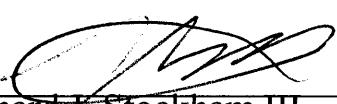
C. DAMAGES

Computation of Damages: Plaintiff claims mental anguish and emotional distress damages for the injury done to him, the calculation of which is not subject to precise calculation and is the province of the jury to determine. The plaintiff also seeks punitive damages, the calculation of which is not subject to precise calculation and is the province of the jury to determine.

D. INSURANCE

This section is not relevant to the plaintiff as there are no claims asserted against him for which there would be any insurance coverage.

Respectfully submitted



Richard J. Stockham III  
State Bar No. STO034  
Attorney for the Plaintiff

OF COUNSEL

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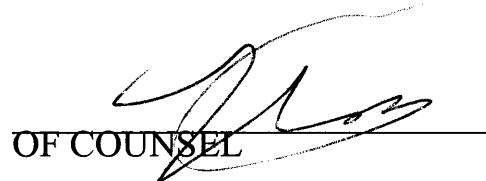
CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing on:

Kristi McDonald, Esq.  
McDonald & McDonald  
1105 Montgomery Hwy  
Birmingham, Al 35216  
Tel (205) 824-0507  
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Gary L. Willford, Jr. Esq.  
Webb & Eley, P.C.  
7475 Halcyon Pointe Road  
Montgomery, Al 36124  
Tel. (334) 262-1850  
Fax (334) 262-1889

by faxing a copy and by placing a copy in the U.S. Mail postage prepaid on this 27 day of March 2007.



OF COUNSEL

A handwritten signature in black ink, appearing to read "Kristi McDonald". Below the signature, the words "OF COUNSEL" are printed in a small, uppercase font.